PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Child Craft Industries, Inc. (Main Plant)
501 East Market Street
Salem, Indiana 47167

and

Child Craft Industries, Inc. (East Plant)
1900 Highway 56 East
Salem, Indiana 47167

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: **T-175-7877-00001**	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood furniture manufacturing facility (Main Plant), and a dimension mill (East Plant).

Responsible Official:	Mr. William S. Suvak
Source Address:	501 East Market Street, Salem, Indiana 47167 (Main Plant); and 1900 Highway 56 East, Salem, Indiana 47167 (East Plant)
Mailing Address:	Same
SIC Code:	2511 (Main Plant), 2499 (East Plant)
County Location:	Washington
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

The Main Plant consists of the following permitted emission units and pollution control devices:

(a) Two (2) wood-fired boilers with coal back up, consisting of the following:

(1) One (1) wood fired boiler with coal backup identified as B-1, constructed in 1951, with a maximum rating of 30.4 MMBtu per hour when burning wood or coal. Emissions shall be controlled by Multi cyclone, then exhausted at Stack/Vent ID #S1.

(2) One (1) wood fired boiler with coal backup identified as B-2, constructed in 1951, with a maximum rating of 28.9 MMBtu per hour when burning wood or coal. Emissions shall be controlled by Multi cyclone, then exhausted at Stack/Vent ID #S1.

(b) One (1) natural gas fired boiler, identified as B-3, constructed in 1951, with a maximum rating of 20.9 MMBtu per hour. Emissions shall be exhausted at Stack/Vent ID #S2.

(c) Gluing Operations, consisting of the following:

(1) Glue Room 5, with a maximum rating of 1,164 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #F1.

(2) Cased Goods Assembly 9, with a maximum rating of 4,350 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B11, and B12.

(3) Crib Assembly 10, with a maximum rating of 3,860 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B94, and B97.

(4) ETC Assembly 11, with a maximum rating of 1,500 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B73.

(5) Packing Cased Goods 16, with a maximum rating of 7,372 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B47.

(6) Packing- Cribs & Etc.17, with a maximum rating of 14,363 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B73.

(d) Eight (8) spray booths, four (4) dip tanks, one (1) roll coater, one (1) skin tank, and three (3) patch areas as identified in the following table. Each surface coating station shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be exhausted at Stack/Vent ID # as shown in the following table:

Station ID	Application Method	Maximum # of Operators	Stack/Vent ID #'s
Roll Coat	roll coating	1	O3, O4
Dip Tank #1	dipping	1	B94
Dip Tank #2	dipping	1	B96
Skin Tank South	dipping	1	B80
B-66	dipping	1	B99
B-50	spraying	1	B85,B86,B87, B88
P-5	aerosol spray can	n/a	no stack
P-6	aerosol spray can	n/a	no stack
P-7	aerosol spray can	n/a	no stack
B-58	dipping	1	B42
B-34	spraying	1	B3
B-19	spraying	1	B29, B30
B-23	spraying	1	B9, B10
B-38	spraying	1	B13
B-16	spraying	1	B59
B-20	spraying	1	B28
B-28	spraying	1	B21,B22,B23,B24

(e) Twenty (20) spray booths and one (1) skin tank as identified in the following table. Each surface coating station shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be controlled by baffles, then exhausted at Stack/Vent ID # as shown in the following table:

Station ID	Application Method	Maximum # of Operators	Stack/Vent ID #'s
B-9A (Shade)	spraying	1	B35
B-30 (1)	spraying	1	B11, B12
B-30 (2)	spraying	1	B11, B12
B-4	spraying	1	B63, B66
B-8	spraying	1	B63, B64
Skin Tank-Main	dipping	1	B64
B-7	spraying	1	B69, B70, B71
B-9	spraying	1	B44, B45, B46
B-13	spraying	1	B51,B52,B53, B54
B-15	spraying	1	B60, B61, B62
B-35	spraying	1	B2
B-26	spraying	1	B16, B17
B-22	spraying	1	B6,B7,B8
B-24	spraying	1	B14, B15
P-1	spraying	1	B97
P-2	spraying	1	B93
B-2	spraying	1	B47
B-6	spraying	1	B68
B-56	spraying	1	B40
B-10	spraying	1	B43
B-11	spraying	1	B20, B27

(f) Nineteen (19) spray booths as identified in the following table. Each booth shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID # as shown in the following table.

Booth ID	Application Method	Maximum # of Operators	Stack/Vent ID #'s
B-29	spraying	1	B18, B19
B-12	spraying	1	B48, B49, B50
B-14	spraying	1	B55,B56,B57,B58

B-51	spraying	2	B89, B90, B91
B-49	spraying	2	B82, B83, B84
B-60	spraying	2	B100, B101
B-62	spraying	1	B102
B-61	spraying	2	B103, B104
B-63	spraying	1	B108
P-3	spraying	1	B95
P-4	spraying	1	B73
B-69	spraying	1	B39A
B-70	spraying	1	B39
B-17	spraying	1	B33, B34
B-36	spraying	1	B1
B-37	spraying	1	B4, B5
B-21	spraying	1	B26, B25
B-42	spraying	1	B74
B-47	spraying	1	B75

(g) Eight (8) spray booths as identified in the following table. Each booth shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be controlled by water wall, then exhausted at Stack/Vent ID # as shown in the following table.

Booth ID	Application Method	Maximum # of Operators	Stack/Vent ID #'s
B-45	spraying	1	B79
B-44	spraying	1	B78
B-43	spraying	1	B77
B-64	spraying	1	B106
B-65	spraying	1	B105
B-55	spraying	1	B36
B-53	spraying	1	B38
B-54	spraying	1	B37

(h) Woodworking Operations, consisting of the following:

(1) Dimension Mill 4, with a maximum rating of 11,675 pounds per hour. Emissions shall be controlled by cyclone and baghouse dust collectors, then exhausted at Stack/Vent ID #BH-B, BH-C, and BH-N.

(2) Mill Room 6, with a maximum rating of 2,081 pounds per hour. Emissions shall be controlled by cyclone and baghouse dust collectors, then exhausted at Stack/Vent ID #BH-B and BH-S.

(3) Child Craft Room 7, with a maximum rating of 2,674 pounds per hour. Emissions are controlled and the two cyclones (C1 and C2), exhaust at Stack/Vent IDs C1 and C2, respectively.

(4) Sand Room 8, with a maximum rating of 6,505 pounds per hour. Emissions are controlled and the two cyclones (C4 and C5), exhaust at Stack/Vent IDs C4 and C5, respectively.

The East Plant consists of the following permitted emission units and pollution control devices:

(a) One (1) wood-fired boiler with natural gas as back-up, identified as EB-4, constructed in 1990, with maximum ratings of 10 MMBtu per hour for wood, and 13.4 MMBtu per hour for natural gas. Emissions shall be exhausted at Stack/Vent ID EB-4.

(b) Lumber End Coating operation, identified as EC-1, with a maximum rating of 2.16 gallons per hour, using one (1) sprayer. Emissions are fugitive.

(c) East Plant Dimension Mill operations consisting of:

(1) One (1) double roughing planer and busting saw controlled by one (1) baghouse, identified as EBH-1, with a maximum rating of 14,000 pounds per hour. Emissions shall be exhausted at Stack/Vent IDs EBH #2 and #3.

(2) Five (5) drying kilns, identified as K-1 through K-5, with a maximum rating of 13,615 pounds per hour of lumber. Emissions are uncontrolled, exhausting at Stack/Vent ID K5.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

East Plant: The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision; and

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP’s shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b) (2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). Rule 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days before the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing,prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 13, 1996 for both plants.

(b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS- Main Plant

Facility Description [326 IAC 2-7-5(15)]: Two (2) wood-fired boilers with coal back-up, consisting of the following:

(1) One (1) wood fired boiler with coal backup identified as B-1, constructed in 1951, with a maximum rating of 30.4 MMBtu per hour when burning wood coal. Emissions shall be controlled by Multi cyclone, then exhausted at Stack/Vent ID #S1.

(2) One (1) wood fired boiler with coal backup identified as B-2, constructed in 1951, with a maximum rating of 28.9 MMBtu per hour when burning wood or coal. Emissions shall be controlled by Multi cyclone, then exhausted at Stack/Vent ID #S1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2-3(d)(Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate emissions from each boiler shall not exceed 0.8 pounds PM per million Btu when burning wood or coal.

D.1.2 Sulfur Dioxide Emission Limitations [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from this facility shall not exceed 6.0 pounds per million British thermal units (lb/MMBtu) of heat input when burning coal.

D.1.3 Fuel Usage

The wood-fired boilers, identified as B-1 and B-2, with coal for back-up, shall only use wood and/or coal as fuel.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and SO_2 limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Particulate Matter (PM)

The Multi cyclone for PM control shall be in operation at all times when the wood fired boilers with coal back-up are in operation.

D.1.7 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing the following options:

(a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier as described under 40 CFR 60.48c(f)(3). The certification shall include:

(1) The name of the coal supplier; and

(2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and

(3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and

(4) The methods used to determine the properties of the coal; and

(b) Sampling and analyzing the coal using one of the following procedures:

(1) Minimum Coal Sampling Requirements and Analysis Methods:

(A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;

(B) Coal shall be sampled at least one (1) time per day;

(C) Minimum sample size shall be five hundred (500) grams;

(D) Samples shall be composited and analyzed at the end of each calendar quarter;

(E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or

(2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or

(c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Visible Emissions Notations

(a) Visible emission notations of the Multi cyclone stack exhaust, S-1, shall be performed once per working shift during normal daylight operations when burning wood and/or coal. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO2 emission limits established in D.1.1 and D.1.2.

(1) Calendar dates covered in the compliance determination period;

(2) Actual coal usage since last compliance determination period;

(3) Sulfur content, heat content, and ash content;

(4) Sulfur dioxide emission rates; and

(5) Vendor analysis of coal and coal supplier certification.

(b) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the boilers stack exhaust.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C -General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS- Main Plant

Facility Description [326 IAC 2-7-5(15)]: One (1) natural gas fired boiler, identified as B-3, constructed in 1951, with a maximum rating of 20.9 MMBtu per hour. Emissions shall be exhausted at Stack/Vent ID #S2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(d) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 20.9 MMBtu per hour heat input boiler, B-3, shall not exceed 0.8 pounds per MMBtu heat input.

D.2.2 Natural Gas Fuel

This facility shall use only natural gas as fuel.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.2.5 Record Keeping Requirements

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 Reporting Requirements

A semi-annual report indicating compliance with Condition D.2.2 and the natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six month period being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS- Main Plant

Facility Description [326 IAC 2-7-5(15)]: Gluing Operations, consisting of the following:

(1) Glue Room 5, with a maximum rating of 1,164 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #F1.

(2) Cased Goods Assembly 9, with a maximum rating of 4,350 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B11, and B12.

(3) Crib Assembly 10, with a maximum rating of 3,860 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B94, and B97.

(4) ETC Assembly 11, with a maximum rating of 1,500 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B73.

(5) Packing Cased Goods 16, with a maximum rating of 7,372 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B47.

(6) Packing- Cribs & Etc.17, with a maximum rating of 14,363 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B73.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable particulate matter (PM) emission rate from the gluing operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.3.3 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.3.5 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

D.3.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63, Subpart JJ]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804 (d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Condition D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.3.2.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(b) To document compliance with Condition D.3.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.3.2, and the Certification form, shall be submitted within sixty (60) calendar days following the compliance date of November 21, 1997. The Initial compliance report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.3.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

(1) November 21, 1997 through May 20, 1998.

(2) May 21, 1998, through November 30, 1998.

(3) December 1 through December 31, 1998.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(c) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(d) The reports required in (a), (b), and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.4 FACILITY OPERATION CONDITIONS- Main Plant

Facility Description [326 IAC 2-7-5(15)]: Eight (8) spray booths, four (4) dip tanks, one (1) roll coater, one (1) skin tank, and three (3) patch areas as identified in the following table. Each surface coating station shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be exhausted at Stack/Vent ID # as shown in the following table:

Station ID	Application Method	Maximum #of Operators	Stack/Vent ID #'s
Roll Coat	roll coating	1	O3, O4
Dip Tank #1	dipping	1	B94
Dip Tank #2	dipping	1	B96
Skin Tank South	dipping	1	B80
B-66	dipping	1	B99
B-50	spraying	1	B85,B86,B87, B88
P-5	aerosol spray can	n/a	no stack
P-6	aerosol spray can	n/a	no stack
P-7	aerosol spray can	n/a	no stack
B-58	dipping	1	B42
B-34	spraying	1	B3
B-19	spraying	1	B29, B30
B-23	spraying	1	B9, B10
B-38	spraying	1	B13
B-16	spraying	1	B59
B-20	spraying	1	B28
B-28	spraying	1	B21,B22,B23,B24

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable particulate matter (PM) emission rate from the surface coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.4.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.4.3 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.4.5 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

D.4.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63, Subpart JJ]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804 (d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Condition D.4.1 and D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Monitoring

Monthly inspections shall be performed of the emissions from the spray coating stacks (B3, B9, B10, B13, B21, B22, B23, B24, B28, B29, B30, B59, B85, B86, B87, B88, O3, O4) and any presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.4.2.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(b) To document compliance with Condition D.4.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(c) To document compliance with Condition D.4.7, the Permittee shall maintain a log of monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.9 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.4.2, and the Certification form, shall be submitted within sixty (60) calendar days following the compliance date of November 21, 1997. The Initial compliance report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.4.2, and the

Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

(1) November 21, 1997 through May 20, 1998.

(2) May 21, 1998, through November 30, 1998.

(3) December 1 through December 31, 1998.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(c) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(d) The reports required in (a), (b), and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.5 FACILITY OPERATION CONDITIONS- Main Plant

Facility Description [326 IAC 2-7-5(15)]: Twenty (20) spray booths and one (1) skin tank as identified in the following table. Each surface coating station shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be controlled by baffles, then exhausted at Stack/Vent ID # as shown in the following table:

Station ID	Application Method	Maximum # of Operators	Stack/Vent ID #'s
B-9A (Shade)	spraying	1	B35
B-30 (1)	spraying	1	B11, B12
B-30 (2)	spraying	1	B11, B12
B-4	spraying	1	B63, B66
B-8	spraying	1	B63, B64
Skin Tank-Main	dipping	1	B64
B-7	spraying	1	B69, B70, B71
B-9	spraying	1	B44, B45, B46
B-13	spraying	1	B51,B52,B53, B54
B-15	spraying	1	B60, B61, B62
B-35	spraying	1	B2
B-26	spraying	1	B16, B17
B-22	spraying	1	B6,B7,B8
B-24	spraying	1	B14, B15
P-1	spraying	1	B97
P-2	spraying	1	B93
B-2	spraying	1	B47
B-6	spraying	1	B68
B-56	spraying	1	B40
B-10	spraying	1	B43
B-11	spraying	1	B20, B27

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable particulate matter (PM) emission rate from the surface coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.5.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.5.3 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.5.5 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

D.5.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63, Subpart JJ]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804 (d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Conditions D.5.1 and D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.7 Particulate Matter (PM)

The baffles for PM control shall be in operation at all times when the twenty (20) spray booths & one (1) dip tank is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the baffles. To monitor the performance of the baffles, weekly observations shall be made of the overspray from the spray booth stacks (B2, B6, B7, B8, B11, B12, B14, B15, B16, B17, B20, B27, B35, B40, B43, B44, B45, B46, B47, B51, B52, B53, B54, B60, B61, B62, B63, B66, B68, B69, B40, B70, B71, B93, B97) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and any presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.5.9 Record Keeping Requirements

(a) To document compliance with Condition D.5.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.5.2.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(b) To document compliance with Condition D.5.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(c) To document compliance with Condition D.5.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.10 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.5.2, and the Certification form, shall be submitted within sixty (60) calendar days following the compliance date of November 21, 1997. The Initial Compliance Report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.5.2, and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

(1) November 21, 1997 through May 20, 1998.

(2) May 21, 1998, through November 30, 1998.

(3) December 1 through December 31, 1998.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(c) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(d) The reports required in (a), (b), and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.6 FACILITY OPERATION CONDITIONS- Main Plant

Facility Description [326 IAC 2-7-5(15)]: Nineteen (19) spray booths as identified in the following table. Each booth shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID # as shown in the following table.

Booth ID	Application Method	Maximum # of Operators	Stack/Vent ID #'s
B-29	spraying	1	B18, B19
B-12	spraying	1	B48, B49, B50
B-14	spraying	1	B55,B56,B57,B58
B-51	spraying	2	B89, B90, B91
B-49	spraying	2	B82, B83, B84
B-60	spraying	2	B100, B101
B-62	spraying	1	B102
B-61	spraying	2	B103, B104
B-63	spraying	1	B108
P-3	spraying	1	B95
P-4	spraying	1	B73
B-69	spraying	1	B39A
B-70	spraying	1	B39
B-17	spraying	1	B33, B34
B-36	spraying	1	B1
B-37	spraying	1	B4, B5
B-21	spraying	1	B26, B25
B-42	spraying	1	B74
B-47	spraying	1	B75

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the PM emissions from the surface coating operations shall not exceed the allowable pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.6.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.6.3 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.6.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.6.5 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

D.6.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63, Subpart JJ]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804 (d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Conditions D.6.1 and D.6.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.6.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the filters, weekly observations shall be made of the overspray from the spray booth stacks (B1, B4, B5, B18, B19, B25, B26, B33, B34, B39, B39A, B48, B49, B50, B55, B56, B57, B58, B73, B74, B75, B82, B83, B84, B89, B90, B91, B95, B100, B101, B102, B103, B104, B108) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and any presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.6.9 Record Keeping Requirements

(a) To document compliance with Condition D.6.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.6.2.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(b) To document compliance with Condition D.6.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(c) To document compliance with Condition D.6.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.10 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.6.2, and the Certification form, shall be submitted within sixty (60) calendar days following the compliance date of November 21, 1997. The Initial Compliance Report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.6.2, and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

(1) November 21, 1997 through May 20, 1998.

(2) May 21, 1998, through November 30, 1998.

(3) December 1 through December 31, 1998.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(c) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(d) The reports required in (a), (b), and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.7 FACILITY OPERATION CONDITIONS- Main Plant

Facility Description [326 IAC 2-7-5(15)]: Eight (8) spray booths as identified in the following table. Each booth shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be controlled by water wall, then exhausted at Stack/Vent ID # as shown in the following table.

Booth ID	Application Method	Maximum # of Operators	Stack/Vent ID #'s
B-45	spraying	1	B79
B-44	spraying	1	B78
B-43	spraying	1	B77
B-64	spraying	1	B106
B-65	spraying	1	B105
B-55	spraying	1	B36
B-53	spraying	1	B38
B-54	spraying	1	B37

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the PM emissions from the surface coating operations shall not exceed the allowable pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.7.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.7.3 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.7.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.7.5 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

D.7.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63, Subpart JJ]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804 (d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.7.1 and 7.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.7.7 Particulate Matter (PM)

The water walls for PM control shall be in operation at all times when the eight (8) spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.8 Monitoring

(a) Daily inspections shall be performed to verify the correct flow to, and the correct operation of the water walls. To monitor the performance of the water walls, weekly observations shall be made of the overspray from the spray booth stacks (B37, B38, B39, B77, B78, B79, B105, B106) while one or more of the booths are in operation.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.7.9 Record Keeping Requirements

(a) To document compliance with Condition D.7.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.7.2.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(b) To document compliance with Condition D.7.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(c) To document compliance with Condition D.7.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.10 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.7.2, and the Certification form, shall be submitted within sixty (60) calendar days following the compliance date of November 21, 1997. The Initial Compliance Report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.7.2, and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

(1) November 21, 1997 through May 20, 1998.

(2) May 21, 1998, through November 30, 1998.

(3) December 1 through December 31, 1998.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(c) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(d) The reports required in (a), (b), and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.8 FACILITY OPERATION CONDITIONS- Main Plant

Facility Description [326 IAC 2-7-5(15)]: Main Plant Woodworking Operations, consisting of the following:

(1) Dimension Mill 4, with a maximum rating of 11,675 pounds per hour. Emissions shall be controlled by cyclone and baghouse dust collectors, then exhausted at Stack/Vent ID #BH-B, BH-C, and BH-N.

(2) Mill Room 6, with a maximum rating of 2,081 pounds per hour. Emissions shall be controlled by cyclone and baghouse dust collectors, then exhausted at Stack/Vent ID #BH-B and BH-S.

(3) Child Craft Room 7, with a maximum rating of 2,674 pounds per hour. Emissions are controlled and the two cyclones (C1 and C2), exhaust at Stack/Vent IDs C1 and C2, respectively.

(4) Sand Room 8, with a maximum rating of 6,505 pounds per hour. Emissions are controlled and the two cyclones (C4 and C5), exhaust at Stack/Vent IDs C4 and C5, respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter (PM) emission rate from the Main Plant woodworking processes shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(1) Based on a process weight rate of 11,675 pounds per hour, the PM emissions from Dimension Mill 4 shall not exceed 13.37 pounds per hour.

(2) Based on a process weight rate of 2,081 pounds per hour, the PM emissions from Mill Room 6 shall not exceed 4.21 pounds per hour.

(3) Based on a process weight rate of 2,674 pounds per hour, the PM emissions from Child Craft Room 7 shall not exceed 4.98 pounds per hour.

(4) Based on a process weight rate of 6505 pounds per hour, the PM emissions from Sand Room 8 shall not exceed 9.04 pounds per hour.

D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.8.3 Compliance Schedule

Pursuant to 326 IAC 2-7-6, the Permittee shall either install a baghouse, to be identified as a new emission unit, reroute the existing duct work from the Child Craft Room and the Sanding Room into an existing baghouse, or conduct a stack test to demonstrate compliance within 180 days of permit issuance. The baghouse for particulate control shall be in operation at all times the Child Craft Room and Sanding Rooms are operating, such that the PM emission rate does not exceed the allowable PM emission rate established in Condition D.8.1.

D.8.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.8.5 Particulate Matter (PM)

The baghouse dust collectors for PM control shall be in operation at all times when the Main Plant woodworking equipment is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.8.6 Visible Emissions Notations

(a) Daily visible emission notations of the Main Plant baghouse stacks exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.8.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.8.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.9 Record Keeping Requirements

(a) To document compliance with Condition D.8.6, the Permittee shall maintain records of daily visible emission notations of the Main Plant baghouse stacks exhaust when exhausting to the atmosphere.

(b) To document compliance with Condition D.8.7, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.9 FACILITY OPERATION CONDITIONS- East Plant

Facility Description [326 IAC 2-7-5(15)]: One (1) wood-fired boiler with natural gas as back-up, identified as EB-4, constructed in 1990, with maximum ratings of 10 MMBtu per hour for wood, and 13.4 MMBtu per hour for natural gas. Emissions shall be exhausted at Stack/Vent ID EB-4.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 10 and 13.4 MMBtu per hour heat input boiler, EB-4, shall not exceed 0.6 pounds per MMBtu heat input when burning wood, and shall not exceed 0.56 pounds per MMBtu heat input when burning natural gas.

D.9.2 Fuel Usage

The wood-fired boiler with natural gas as back-up, identified as EB-4, shall use only wood and/or natural gas as fuel.

D.9.3 Opacity [326 IAC 5-1]

Pursuant to Construction Permit # 175-1948-00001 operation condition 6, issued on April 8, 1991, and 326 IAC 5-1 (Visible Emissions Limitations), the wood-fired boiler shall be limited to 40% opacity over a six minute average, and 60% opacity for a cumulative total of fifteen minutes in a six hour period.

D.9.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.9.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.9.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.9.6 Particulate Matter (PM)

The cyclone for PM control shall be in operation at all times when the wood fired boiler is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.9.7 Visible Emissions Notations

(a) Visible emission notations of the boiler stack exhaust (EB-4), when burning wood, shall be performed daily during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.9.8 Record Keeping Requirements

(a) Pursuant to Construction Permit # 175-1948-00001 operation condition 10, issued on April 8, 1998, and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units), records for the wood fired boiler, EB-4, shall be maintained of the amount of fuel combusted during each day. All records shall be maintained for a period of two years.

(b) To document compliance with Condition D.9.7, the Permittee shall maintain records of daily visible emission notations of the boilers stack exhaust.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.9.9 Reporting Requirements

A quarterly report indicating compliance with Condition D.9.1, and the natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six month period being reported.

SECTION D.10 FACILITY OPERATION CONDITIONS- East Plant

Facility Description [326 IAC 2-7-5(15)]: Lumber End Coating operation, identified as EC-1, with a maximum rating of 2.16 gallons per hour, using one (1) sprayer. Emissions are fugitive.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.10.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the PM emissions from the lumber end coating operation shall not exceed the allowable pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.10.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.10.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.11 FACILITY OPERATION CONDITIONS- East Plant

Facility Description [326 IAC 2-7-5(15)]: East Plant Dimension Mill; One (1) double roughing planer and busting saw controlled by one (1) baghouse, identified as EBH-1, with a maximum rating of 14,000 pounds per hour. Emissions shall be exhausted at Stack/Vent IDs EBH2 and 3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.11.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter (PM) emission rate from the dimension mill planer and saw operations shall not exceed 15.1 pounds per hour based on a process weight rate of 14,000 pounds per hour, as established by using the following formula:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.11.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.11.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.11.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.11.4 Particulate Matter (PM)

The baghouse dust collectors for PM control shall be in operation at all times when the dimension mill planer and saw operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.11.5 Visible Emissions Notations

(a) Daily visible emission notations of the dimension mill baghouse stack exhausts (EBH2 and 3) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.11.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.11.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.11.8 Record Keeping Requirements

(a) To document compliance with Condition D.11.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stacks exhaust when exhausting to the atmosphere.

(b) To document compliance with Condition D.11.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
CERTIFICATION FORM

Source Name: Child Craft Industries, Inc.
Source Addresses: 501 East Market Street, Salem, Indiana 47167 (Main Plant)
1900 Highway 56 East, Salem, IN 47167 (East Plant)
Mailing Address: 501 East Market Street, Salem, Indiana 47167
Part 70 Permit No.: T-175-7877-00001

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT FORM

Source Name: Child Craft Industries, Inc.
Source Addresses: 501 East Market Street, Salem, Indiana 47167 (Main Plant)
1900 Highway 56 East, Salem, IN 47167 (East Plant)
Mailing Address: 501 East Market Street, Salem, Indiana 47167
Part 70 Permit No.: T-175-7877-00001

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Child Craft Industries, Inc.
Source Addresses: 501 East Market Street, Salem, Indiana 47167 (Main Plant)
1900 Highway 56 East, Salem, Indiana 47167 (East Plant)
Mailing Address: 501 East Market Street, Salem, Indiana 47167
Part 70 Permit No.: T-175-7877-00001

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL REPORT FORM
For HAPs usage - Wood Furniture NESHAP

Source Name: Child Craft Industries, Inc.
Source Addresses: 501 East Market Street, Salem, Indiana 47167 (Main Plant)
1900 Highway 56 East, Salem, Indiana 47167 (East Plant)
Mailing Address: 501 East Market Street, Salem, Indiana 47167
Part 70 Permit No.: T-175-7877-00001
Facility: Main Plant Surface Coating and Gluing Operations
Parameter: HAPs - NESHAP
Limit: Finishing operations - 1.0 lb VHAP/lb Solids
Foam adhesives (meeting upholstered flammability requirements) -1.8 lb VHAP/lb Solids
All other contact adhesives - 1.0 lb VHAP/lb Solids
Thinners (on-site formulation) - 3% VHAP content by weight
All other thinner mixtures - 10% VHAP content by weight
Strippable spray booth coating - 0.8 lb VOC/lb solids

YEAR: _____

Month	Finishing Operations (1 lb VHAP/lb Solid)	Thinners (on site formulation) (3% by weight)	All Other Thinner mixtures (10% by weight)	Foam adhesives (upholstered) (1.8 lb VHAP/lb solid)	Contact Adhesives (1.0 lb VHAP/lb solid)	Spray Booth coating (0.8 lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Child Craft Industries, Inc.
Source Addresses: 501 East Market Street, Salem, Indiana 47167 (Main Plant)
1900 Highway 56 East, Salem, Indiana 47167 (East Plant)
Mailing Address: 501 East Market Street, Salem, Indiana 47167
Part 70 Permit No.: T-175-7877-00001
Facility: Boilers B-1 and B-2
Parameter: PM, SO_2, coal analysis, usage
Limit: PM- 0.8 pounds per MMBtu heat input when burning coal; and
SO_2- 6.0 pounds per MMBtu heat input when burning coal.

YEAR: _____

Month	Coal Usage (tons)	Monthly Average Sulfur Content (%)	Monthly Average Ash Content (%)	Monthly Average Heat Content* (MMBtu/lb)	PM Emission Rate (lbs/MMBtu)	SO_2 Emission Rate (lbs/MMBtu)
# of Deviations						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Child Craft Industries, Inc.
Source Addresses: 501 East Market Street, Salem, Indiana 47167 (Main Plant)
1900 Highway 56 East, Salem, Indiana 47167 (East Plant)
Mailing Address: 501 East Market Street, Salem, Indiana 47167
Part 70 Permit No.: T-175-7877-00001

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please check the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviations**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Names:	**Child Craft Industries, Inc.(Main Plant, and East Plant)**
Source Locations:	**Main Plant- 501 East Market Street, Salem, Indiana 47167**
	East Plant- 1900 Highway 56 East, Salem, Indiana 47167
County:	**Washington**
SIC Codes:	**2511 (Main Plant), 2499 (East Plant)**
Operation Permit No.:	**T-175-7877-00001**
Permit Reviewer:	**Melissa Groch**

The Office of Air Management (OAM) has reviewed a Part 70 permit application, and a Federally Enforceable State Operating Permit application from Child Craft Industries, Inc. relating to the operation of a wood furniture manufacturing facility and a dimension mill.

Source Definition

This wood furniture manufacturing facility and a dimension mill consists of two (2) plants:

(1) Plant 1, the Main Plant, is located at 501 East Market Street, Salem, Indiana; and

(2) Plant 2, the East Plant, is located at 1900 Highway 56 East, Salem, Indiana.

These two plants were previously viewed as different sources but under the current definition of source criteria, they will be combined as one source under the same plant identification number, 00001. Previously, the East Plant identification number was misidentified as 0001 when it should have been identified as 00008. These sources are combined because the East Plant supplies the Main Plant with over 50 percent of its product, kiln dried lumber. The Main Plant uses the East Plant's end product for its raw material to manufacture wood furniture. Also, both plants are within a mile of each other, and while they don't share identical SIC codes, they are owned by the same corporation and share employees.

These plants operated under Smith Cabinet Manufacturing Company until 1993.

Permitted Emission Units and Pollution Control Equipment

The Main Plant consists of the following permitted emission units and pollution control devices:

(a) Two (2) wood-fired boilers with coal back up, consisting of the following:

(1) One (1) wood fired boiler with coal backup, identified as B-1, constructed in 1951, with a maximum rating of 26.5 MMBtu per hour when burning wood, and 33.4 MMBtu per hour when burning coal. Emissions shall be controlled by Multi cyclone, then exhausted at Stack/Vent ID #S1.

(2) One (1) wood fired boiler with coal backup, identified as B-2, constructed in 1951, with a maximum rating of 25 MMBtu per hour when burning wood, and 33.4 MMBtu per hour when burning coal. Emissions shall be controlled by Multi cyclone, then exhausted at Stack/Vent ID #S1.

(b) One (1) natural gas fired boiler, identified as B-3, constructed in 1951, with a maximum rating of 20.9 MMBtu per hour. Emissions shall be exhausted at Stack/Vent ID #S2.

(c) Gluing Operations, consisting of the following:

(1) Glue Room 5, with a maximum rating of 1,164 pounds per hour. Emissions shall be exhausted at Stack/Vent ID #F1.

(2) Cased Goods Assembly 9, with a maximum rating of 4,350 pounds per hour. Emissions shall be exhausted at Stack/Vent ID #B11, and B12.

(3) Crib Assembly 10, with a maximum rating of 3,852 pounds per hour. Emissions shall be exhausted at Stack/Vent ID #B94, and B97.

(4) ETC Assembly 11, with a maximum rating of 1,486 pounds per hour. Emissions shall be exhausted at Stack/Vent ID #B73.

(5) Packing-Cased Goods 16, with a maximum rating of 6,696 pounds per hour. Emissions shall be exhausted at Stack/Vent ID #B47.

(6) Packing- Cribs & Etc.17, with a maximum rating of 13,454 pounds per hour. Emissions shall be exhausted at Stack/Vent ID #B73.

(d) Six (6) spray booths, four (4) dip tanks, & one (1) roll coater booth as identified in the following table. Emissions shall be exhausted at Stack/Vent ID # as shown in the following table:

Booth ID	Application Method	Stack/Vent ID #'s
Roll Coat	hand, roll coating, and dipping	O3, O4
Dip Tank/Skin Tank	dipping	B94
B-66	dipping	B99
B-50	1 airless spray gun	B85, B86, B87, B88
P-5	5 air supplied spray guns	B47
P-6	3 air supplied spray guns	B47
P-7	1 air supplied spray gun	B47
B-58	dipping	B42
B-97 *(not in use)*	1 air supplied spray gun	B97

(e) Twenty (20) spray booths and one (1) dip tanks as identified in the following table. Emissions shall be controlled by baffles, then exhausted at Stack/Vent ID # as shown in the following table:

Booth ID	Application Method	Stack/Vent ID #'s
Shade *(not in use)*	2 air supplied, 1 syphon spray guns	B113
B-30 (1) & (2)	1 airless, 6 HVLP spray guns	B11, B12
B-4, B-8	2 HVLP spray guns	B63, B66
Skin Tank	dipping	B64
B-7	1 HVLP, 1 airless spray guns	B69, B70, B71
B-9	2 airless spray guns	B44, B45, B46
B-13	2 HVLP spray guns	B51, B52, B53, B54
B-15	1 airless spray gun	B60, B61, B62
B34 through B37	1 airless, 2 HVLP spray guns	B1, B2, B3, B4, B5
B26 *(Not in use)*	1 airless, 5 air supplied, 1 syphon	B16, B17
B22, B24, B17	5 HVLP, 5 airless spray guns	B6,B7,B8,B14,B15,B33,B34
P-1	4 air assisted spray guns	B112
P-2	8 air assisted spray guns	B93
B-2	2 HVLP, 11 air supplied, 1 air mix	B47

(f) Thirteen (13) spray booths as identified in the following table. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID # as shown in the following table.

Booth ID	Application Method	Stack/Vent ID #'s
B-29	2 airless, 1 HVLP spray guns	B18, B19
B-12 *(not in use)*	2 airless, 1 air supplied spray guns	B48, B49, B50
B-14	3 airless spray guns	B55, B56, B57, B58
B-51	2 airless, 2 HVLP spray guns	B89
B-49	3 airless spray guns	B82, B83, B84
B-60	5 airless, 2 HVLP spray guns	B100, B101

B-62	2 airless, 1 HVLP spray guns	B102
B-61	4 airless, 3 HVLP spray guns	B103, B104
B-63	1 airless spray gun	B108
P-3	5 air assisted spray guns	B111
P-4	5 air assisted spray guns	B73
B-69	1 HVLP spray gun	B39A
B-70	1 HVLP spray gun	

(g) Eight (8) spray booths as identified in the following table. Emissions shall be controlled by water wall, then exhausted at Stack/Vent ID # as shown in the following table.

Booth ID	Application Method	Stack/Vent ID #'s
B-45	1 airless, 3 HVLP spray guns	B79
B-44	1 airless, 1 HVLP spray guns	B78
B-43	1 airless, 2 HVLP spray guns	B77
B-64	2 electrostatic air assisted spray guns	B106
B-65	2 electrostatic air assisted spray guns	B105
B-55	2 electrostatic air assisted spray guns	B39
B-53	4 electrostatic spray guns	B38
B-54	4 electrostatic air assisted spray guns	B37

(h) Main Plant Woodworking Operations, consisting of the following:

(1) Dimension Mill 4, with a maximum rating of 11,675 pounds per hour. Emissions shall be controlled by cyclone and baghouse dust collectors, then exhausted at Stack/Vent IDs BH-B, BH-C, and BH-N.

(2) Mill Room 6, with a maximum rating of 2,081 pounds per hour. Emissions shall be controlled by cyclone and baghouse dust collectors, then exhausted at Stack/Vent IDs BH-B and BH-S.

(3) Child Craft Room 7, with a maximum rating of 2,674 pounds per hour. Emissions are controlled and the two cyclones (C1 and C2), exhaust at Stack/Vent IDs C1 and C2, respectively.

(4) Sand Room 8, with a maximum rating of 6,505 pounds per hour. Emissions are controlled and the two cyclones (C4 and C5), exhaust at Stack/Vent IDs C4 and C5, respectively.

The East Plant consists of the following permitted emission units and pollution control devices:

(a) One (1) wood fired boiler with natural gas back-up, identified as EB-4, constructed in 1990, with a maximum rating of 10 MMBtu per hour for wood, and 13.4 MMBtu per hour for natural gas. Emissions shall be exhausted at Stack/Vent ID EB-4.

(b) Lumber End Coating operation, identified as EC-1, with a maximum rating of 28,816 units per hour, using one (1) spray gun. Emissions are fugitive.

(c) East Plant Dimension Mill operations consisting of:

One (1) double roughing planer and busting saw controlled by one (1) baghouse, identified as EBH-1, with a maximum rating of 14,000 pounds per hour. Emissions shall be exhausted at Stack/Vent IDs EBH2 and 3.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The Main Plant consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Propane or liquified petroleum gas, or butane-fired combustion unit(s) with heat input equal to or less than six million (6,000,000) Btu per hour:

(1) Three (3) propane drying ovens O-24, O-25, O-26, with a maximum rating of one (1) gallon per hour (0.1 MMBtu per hour). Emissions shall be exhausted at Stack/Vent ID #O24, O25 and O26, respectively.

(b) Fuel oil-fired combustion unit(s) with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(d) Combustion unit(s) flame safety purging on startup.

(e) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) Closed loop heating and cooling systems.

(i) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(j) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.

(k) Quenching operations used with heat treating processes.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(n) Paved and unpaved roads and parking lots with public access.

(o) Uncovered coal conveying of less than or equal to 120 tons per day.
(p) Coal bunker and coal scale exhausts and associated dust collector vents.

(q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(r) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(s) Purge double block and bleed valves.

(t) Vents from ash transport systems not operated at positive pressure.

(u) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(v) Activities or categories of activities with individual HAP emissions not previously identified. Any unit with potential, uncontrolled emissions greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP.

(1) Oil House: paint and furniture are sampled. Two (2) HVLP guns are used.

(2) Drying Ovens: sixteen (16) ovens heated with boiler steam, and four (4) ovens heated with electricity.

(w) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs:

(1) Thinner recycling

(x) Activities/categories not already identified with potential, uncontrolled emissions equal to or less than the following thresholds: Pb- 0.6 tons per year or 3.29 pounds per day; SO_2- 5 pounds per hour or 25 pounds per day; NOx- 5 pounds per hour or 25 pounds per day; CO- 25 pounds per day; PM- 5 pounds per hour or 25 pounds per day; VOC- 3 pounds per hour or 15 pounds per day.

(1) PFD #13: booths B-48, B-46 are not in use; three (3) airless and three (3) air supplied guns not in use.

(2) PFD #12: booth B-17 is not in use; one (1) splatter gun and eighteen (18) air supplied guns not in use.

The East Plant consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Five (5) drying kilns, identified as K-1 through K-5, with a maximum rating of 13,615 pounds per hour of lumber. Emissions are shall be exhausted at Stack/Vent ID K5.

(b) Space heaters, process heaters, or boilers using the following fuels:

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(2) Fuel oil-fired combustion sources with heat input equal to or less then two million (2,000,000) Btu per hour and firing fuel containing less than five tenths (0.5) percent sulfur by weight.

(3) Wood-fired combustion sources with heat input equal to or less than one million (1,000,000) Btu per hour and not burning wood refuse, treated wood or chemically contaminated wood.

(c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(f) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(i) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;

(2) having a vapor pressure equal to or less than 0.7; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(k) Closed loop heating and cooling systems.

(l) Quenching operations used with heat treating processes.

(m) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

(n) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(o) Paved and unpaved roads and parking lots with public access.

(p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(q) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(r) Emergency gasoline generators not exceeding 110 horsepower.

(s) Purge double block and bleed valves.

Existing Approvals

The Main Plant has been operating under the following approvals:

(a) OP 88-03-91-0058, issued June 8, 1987;

(b) OP 88-03-91-0059, issued June 8, 1987;

(c) OP 88-03-91-0060, issued June 8, 1987;

(d) OP 88-03-91-0061, issued June 8, 1987;

(e) OP 88-03-91-0062, issued June 8, 1987;

(f) OP 88-03-91-0063, issued June 8, 1987;

(g) OP 88-03-91-0064, issued June 8, 1987; and

(h) OP 88-03-91-0065, issued June 8, 1987.

The East Plant has been operating under the following approvals:

(a) CP 175-1948-0001, issued on April 8, 1991;

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

East Plant, CP 175-1948-0001, issued on April 8, 1991:

Operation Condition 8:

The milling area shall comply with 326 IAC 6-3 (Particulate Emission Limitations for Process Operations). Particulate matter emissions from the milling area shall be limited to 0.15 pounds per hour pursuant to the rule.

Reason not incorporated:

The particulate matter emissions from the milling area shall be limited to 15.1 pounds per hour when operating at a process weight rate of 14,000 pounds per hour pursuant to 326 IAC 6-3.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the Main Plant and a Federally Enforceable State Operating Permit for the East Plant were received on December 13, 1996.

Emission Calculations

See Appendix A , pages 1 to 3, of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Main and East Plant Total Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 100, less than 250
SO_2	greater than 250
VOC	greater than 250
CO	greater than 100, less than 250
Single HAP	greater than 10
Combination HAPs	greater than 25
NO_x	greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

(a) The total potential emissions (as defined in the Indiana Rule) of PM-10, SO_2, VOC, NOx, and CO are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The total potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. The information reflects 1995 OAM emission data for the Main Plant, and data supplied in the Federally Enforceable State Operating Permit application for the East Plant. No previous emission data has been received from the source regarding the East Plant.

Pollutant	Main and East Plant Actual Emissions (tons/year)
PM	92.77
PM-10	81.45
SO_2	13.34
VOC	861.09
CO	47.07
Single HAP	84.72
Combination HAPs	213.76
NO_x	7.82

County Attainment Status

The source is located in Washington County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Washington County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

Main Plant

The wood fired boilers with coal back-up are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart D), because their construction date of 1951precedes the applicable date of August 17, 1971, and each boiler is rated at less than the required 250 MMBtu heat input rate per hour when using coal.

The wood fired boilers with coal back-up are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40a, Subpart Da), because their construction date of 1951precedes the applicable date of September 18, 1978, and each boiler is rated at less than the required 250 MMBtu heat input rate per hour when using coal.

The wood fired boilers with coal back-up are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b, Subpart Db), because their construction date of 1951precedes the applicable date of June 19, 1984, and each boiler is rated at less than the required 100 MMBtu heat input rate per hour when using coal.

The wood fired boilers with coal back-up are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because their construction date of 1951precedes the applicable date of June 9, 1989.

The wood furniture coating and gluing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(a) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(2) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(4) Use a combination of (1), (2), and (3).

(b) Limit VHAP emissions contact adhesives as follows:

(1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(2) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(d) The source shall complete a work practice implementation plan within sixty (60) calender days after the source's compliance date as specified in 40 CFR 63.803. The plan must detail how the source will incorporate environmentally desirable practices into operation.

(e) A semi-annual summary report shall be prepared and submitted to IDEM, OAM, to document the ongoing compliance status of the wood furniture coating operations.

(f) A copy of this rule is enclosed.

East Plant

The wood fired boiler with natural gas back-up, identified as EB-4, with maximum ratings of 10 MMBtu per hour for wood, and 13.4 MMBtu per hour for natural gas, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc). Since this boiler has a maximum capacity of less than 30 million British thermal units per hour (MMBtu/hr), there are no emission limitations that apply, only record keeping and reporting requirements.

The Lumber End gluing operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ) and shall comply with the following conditions:

(a) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(2) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(4) Use a combination of (1), (2), and (3).

(b) Limit VHAP emissions contact adhesives as follows:

(1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(2) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(d) The source shall complete a work practice implementation plan within sixty (60) calender days after the source's compliance date as specified in 40 CFR 63.803. The plan must detail how the source will incorporate environmentally desirable practices into operation.

(e) A semi-annual summary report shall be prepared and submitted to IDEM, OAM, to document the ongoing compliance status of the wood furniture coating operations.

(f) A copy of this rule is enclosed.

State Rule Applicability- Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM-10, VOC and CO. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 4-1-2 (Open Burning)

Pursuant to 326 IAC 4-1-2, the applicant shall not open burn any material, except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2, except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Emissions)

Pursuant to 326 IAC 6-4, fugitive dust shall not be visibly crossing the property lines except as provided in 326 IAC 6-4-6 (Exceptions).

State Rule Applicability

Main Plant

Two (2) Wood-fired Boilers with Coal Backup, Constructed in 1951

326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3(d), the particulate emissions from each boiler shall not exceed 0.8 pounds PM per million Btu.

Since the 26.5 MMBtu per hour boiler (B-1) PM potential emission rate of 22.42 pounds per hour when burning wood before controls is more than the allowable emission rate of 21.2 pounds per hour, the cyclone must be operating at all times this boiler is operating. With a collector efficiency of 83.5%, the potential PM emission rate is 3.7 pounds per hour. Therefore this boiler is in compliance with 326 IAC 6-2-3(d).

Since the 25 MMBtu per hour boiler (B-2) PM potential emission rate of 21.15 pounds per hour when burning wood before controls is more than the allowable emission rate of 20 pounds per hour, the cyclone must be operating at all times this boiler is operating. With a collector efficiency of 83.5%, the potential PM emission rate is 3.49 pounds per hour. Therefore this boiler is in compliance with 326 IAC 6-2-3(d).

Since the 33.4 MMBtu per hour boilers (B-1 and B-2) PM potential emission rate of 100.2 pounds per hour each when burning coal before controls is more than the allowable emission rate of 26.72 pounds per hour each, the cyclone must be operating at all times the boilers are operating. With a collector efficiency of 83.5%, the potential PM emission rate is 16.5 pounds per hour each. Therefore the boilers are in compliance with 326 IAC 6-2-3(d).

326 IAC 7-1.1 (Sulfur dioxide limitations)

Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from each boiler shall not exceed 6.0 pounds per million British thermal units (lb/MMBtu) of heat input when using coal for backup.

Since each 33.4 MMBtu per hour boiler (B-1 and B-2) SO_2 potential emission rates of 57.69 pounds per hour each when burning coal is less than the allowable emission rate of 200.4 pounds per hour each, each boiler is in compliance with 326 IAC 7-1.1.

Also, the following calculation shows that each boiler (B1, B-2) is in compliance with the 6.0 pounds of SO_2 per million Btu heat input stated in the above condition:

6.0 lbs SO_2/ MMBtu * 26.8 MMBtu/ton **/** 38 lb/ton = % sulfur = 4% sulfur

Since the sulfur content of the coal is 4%, then each boiler listed above is in compliance with 326 IAC 7-1.1-2.

One (1) Natural Gas-fired Boiler, B-3, Constructed in 1951

326 IAC 6-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3(d), the particulate emissions from this boiler, B-3, shall not exceed 0.8 pounds PM per million Btu.

Since the 20.9 MMBtu per hour boiler (B-3) PM potential emission rate of 0.15 pounds per hour before controls is less than the allowable emission rate of 16.72 pounds per hour, this boiler is in compliance with 6-2-3(d).

Gluing Operations

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emissions from the gluing operations shall not exceed the allowable pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-2 (Surface Coating)

The Crib assembly 10, ETC Assembly 11, Packing-Cased Goods 16, and Packing-Cribs & Etc. 17 are not subject to 326 IAC 8-1-6, 326 IAC 8-2-12, or 326 IAC 8-6-1 as the following is true:

(a) This source is located in Washington County, and

(b) This facility's construction predates October 7, 1974.

326 IAC 8-2 (Surface Coating)

The Glue Room 5, and Case Goods Assembly 9 are not subject to either 326 IAC 8-1-6, 326 IAC 8-2-12, or 326 IAC 8-6-1 since the following are true:

(a) This source is located in Washington County;

(b) This facility's construction predates July 1, 1990; and

(c) Potential VOC emissions from this facility do not exceed 25 tons per year.

Surface Coating Operations

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emissions from each of the surface coating operations shall not exceed the allowable pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-2 (Surface Coating)

The surface coating operations are not subject to 326 IAC 8-1-6, 326 IAC 8-2-12, or 326 IAC 8-6-1 as the following is true:

(a) This source is located in Washington County, and

(b) This facility's construction predates October 7, 1974.

Woodworking Operations

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter (PM) emission rate from the woodworking processes shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Based on a process weight rate of 11,675 pounds per hour, the PM emissions from Dimension Mill 4 shall not exceed 13.37 pounds per hour. Since the potential PM emission rate before controls is 22.7 pounds per hour, which is greater than the allowable emissions of 13.37 pounds per hour, the baghouse must be operating at all times this facility is operating. With a baghouse efficiency of 99.26%, the potential PM emissions after controls are 1.23 pounds per hour. Therefore, this facility is in compliance with 326 IAC 6-3-2.

Based on a process weight rate of 2,081 pounds per hour, the PM emissions from Mill Room 6 shall not exceed 4.21 pounds per hour. Since the potential PM emission rate before controls is 107.43 pounds per hour, which is greater than the allowable emissions of 4.21 pounds per hour, the baghouse must be operating at all times this facility is operating. With a baghouse efficiency of 99.26%, the potential PM emissions after controls are 0.963 pounds per hour. Therefore, this facility is in compliance with 326 IAC 6-3-2.

Based on a process weight rate of 2,674 pounds per hour, the PM emissions from Child Craft Room 7 shall not exceed 4.98 pounds per hour. Since the potential PM emission rate after controls is 147.1 pounds per hour, which is greater than the allowable emissions of 4.98 pounds per hour, then this facility is not in compliance with 326 IAC 6-3-2. Pursuant to 326 IAC 2-7-6 (Compliance Requirements), the Permittee shall install a baghouse, reroute the ductwork into another existing baghouse, or show compliance through stack testing within 90 days of permit issuance. This baghouse (new or existing) for PM control shall be in operation at all times the Child Craft Room 7 is operating such that the PM emission rate does not exceed the allowable PM emission rate established in condition D.8.1 of the permit.

Based on a process weight rate of 2,674 pounds per hour, the PM emissions from Sand Room 8 shall not exceed 5.48 pounds per hour. Since the potential PM emission rate after controls is 32.53 pounds per hour, which is greater than the allowable emissions of 5.48 pounds per hour, then this facility is not in compliance with 326 IAC 6-3-2. Pursuant to 326 IAC 2-7-6 (Compliance Requirements), the Permittee shall install a baghouse, reroute the ductwork into another existing baghouse, or show compliance through stack testing within 90 days of permit issuance. This baghouse (new or existing) for PM control shall be in operation at all times the Sand Room 8 is operating such that the PM emission rate does not exceed the allowable PM emission rate established in condition D.8.1 of the permit.

East Plant

One (1) Wood fired Boiler with natural gas back-up, Constructed in 1990

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 10 and 13.4 MMBtu per hour heat input boiler, EB-4, shall not exceed 0.6 pounds per MMBtu heat input when burning wood, and shall not exceed 0.56 pounds per MMBtu heat input when burning natural gas.

Particulate emissions from this boiler (EB-4), shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where Pt = pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input; and
Q = total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input

Since the 10 MMBtu per hour boiler (EB-4) PM potential emission rate of 4.23 pounds per hour before controls is less than the allowable emission rate of 6 pounds per hour when burning wood, this boiler is in compliance with 6-2-4(a).

Since the 13.4 MMBtu per hour boiler (EB-4) PM potential emission rate of 0.1 pounds per hour is less than the allowable emission rate of 7.5 pounds per hour when burning natural gas, this boiler is in compliance with 6-2-4(a).

326 IAC 9-1 (Carbon Monoxide)

Pursuant to Construction Permit # 175-1948-00001 operation condition 9, issued on April 8, 1991, and 326 IAC 9-1 (Carbon Monoxide), the wood-fired boiler's waste gas stream shall be burned in direct-flame afterburners or controlled by other means approved by the commissioner, pursuant to this rule. This boiler's design is hereby approved as an appropriate means of control.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to Construction Permit # 175-1948-00001 operation condition 6, issued on April 8, 1991, and 326 IAC 5-1 (Visible Emissions Limitations), the wood-fired boiler shall be limited to 40% opacity over a six minute average, and 60% opacity for a cumulative total of fifteen minutes in a six hour period.

Dimension Mill Operations

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter (PM) emission rate from the East Plant Dimension Mill operation shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Based on a process weight rate of 14,000 pounds per hour, the PM emissions from the East Plant Dimension Mill operation shall not exceed 15.1 pounds per hour.

Both Plants

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for response steps and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate response steps within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The Main Plant wood fired boilers with coal backup, and the East Plant wood fired boiler with natural gas backup have applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the both plant's wood fired boiler operations shall be performed during normal daylight operations when using wood and/or coal and when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the multi cyclones for the Main Plant boilers and the cyclone for the East Plant boiler must operate properly to ensure compliance with 326 IAC 6-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-7 (Part 70).

The Main Plant surface coating and Main Plant gluing operations have applicable compliance monitoring conditions as specified below:

(a) The baffles for PM control shall be in operation at all times when the twenty (20) spray booths & one (1) dip tank are in operation.

(b) The dry filters for PM control shall be in operation at all times when the thirteen (13) spray booths are in operation.

(c) The water walls for PM control shall be in operation at all times when the eight (8) spray booths are in operation.

(d) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters and baffles, and to verify the proper operation of the water walls and the proper flow of water to the water walls. To monitor the performance of the baffles, dry filters, and water walls, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(e) Weekly inspections shall be performed of the coating emissions from the stacks and any presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C- Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(f) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the baffles, dry filters, and water walls for the Main Plant surface coating processes must operate properly to ensure compliance with 326 IAC 6-3-2(c) (Process Operations) and 326 IAC 2-7 (Part 70).

The Main Plant woodworking processes and East Plant Dimension Mill have applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the woodworking operations shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the woodworking operations, at least once daily when the woodworking process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses for these processes must operate properly to ensure compliance with 326 IAC 6-3-2(c) (Process Operations) and 326 IAC 2-7 (Part 70).

The East Plant Lumber End Coating operation has applicable compliance monitoring conditions as specified below:

Weekly inspections shall be performed of the lumber end coating operation emissions from the spray area and any presence of overspray on the nearby ground. The Compliance Response Plan for this operation shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

Conclusion

The operation of this wood furniture manufacturing plant, and raw lumber mill shall be subject to the conditions of the attached proposed Part 70 Permit No. T-175-7877-00001.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	**Child Craft Industries, Inc.**
Source Location:	**501 East Market Street, Salem, Indiana 47167 (Main Plant)** **1900 Highway 56 East, Salem, Indiana 47167 (East Plant)**
County:	**Washington**
SIC Code:	**2511 (Main Plant), 2499 (East Plant)**
Operation Permit No.:	**T175-7877-00007**
Permit Reviewer:	**Melissa Groch**

On October 29, 1998, the Office of Air Management (OAM) had a notice published in the Salem Leader/Democrat, Salem, Indiana, stating that Child Craft Industries, Inc. had applied for a Part 70 Operating Permit to operate a stationary wood furniture manufacturing facility (Main Plant), and a dimension mill (East Plant). The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 1, 1998, and on December 8, 1998 the following comments were received regarding the proposed Part 70 permit for Child Craft Industries, Inc. (deleted or changed language appears as ~~strikeouts~~, new language is **bolded**).

Comment 1:

Boilers B1 and B2 each have a maximum rating of 33.4 MMBtu/hr whether burning wood or coal. There should not be a different rating for wood combustion.

Response to Comment 1:

The IDEM agrees that there should not be a different rating for these boilers when burning either fuel. However, the IDEM disagrees that their rating should be 33.4 MMBtu per hour each. According to a memo regarding a February 18, 1993 stack test at Child Craft Industries, these two boilers tested in compliance at average capacities of 25,133 pounds of steam per hour for B1, and 23,750 pounds steam per hour for B2. When these two numbers are divided by 0.95 (or 95%), the capacities in pounds of steam per hour are 26,455 and 25,000, respectively. The original description for these two boilers in the draft permit is incorrect. The capacities for each, when using either wood or coal, should have been determined by multiplying 33.4 MMBtu/hr and 91% for the permitted maximum capacity of boiler B-1, and by multiplying 33.4 MMBtu/hr and 86.5% for the permitted maximum capacity of boiler B-2, as suggested by the February 18, 1993 memo. As a result, these permitted capacities should be listed as 30.4 MMBtu/hr for B-1, and 28.9 MMBtu/hr for B-2, when using either wood or coal. Until these units test at higher capacities, they remain permitted at the capacity for which they tested in compliance.

As a result of the capacity correction to these units, an appendix to this document has been added showing the revised calculations for these two units, and as shown below, their descriptions have changed in condition A.2(a) and in the description box for Section D.1:

(1) One (1) wood fired boiler with coal backup identified as B-1, constructed in 1951, with a maximum rating of ~~26.5~~ **30.4** MMBtu per hour when burning wood~~, and 33.4 MMBtu per hour when burning~~ **or** coal. Emissions shall be controlled by Multi cyclone, then exhausted at Stack/Vent ID #S1.

(2) One (1) wood fired boiler with coal backup identified as B-2, constructed in 1951, with a maximum rating of ~~25~~ **28.9** MMBtu per hour when burning wood~~, and 33.4 MMBtu per hour when burning~~ **or** coal. Emissions shall be controlled by Multi cyclone, then exhausted at Stack/Vent ID #S1.

These changes are not recorded in the Technical Support Document since the OAM prefers that the document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Let the above modification serve as a record of this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under part (a) in Permitted Emission Units and Pollution Control Equipment and under the State Rule Applicability section for the Main Plant operations.

Comment 2:

The maximum rating for each of these operations [*Condition A.2 (c)(3)(4)(5) and (6)*] is incorrect. It appears as though the IDEM used the Raw Material Usage rate supplied in section (6) of the PI-26 forms of the application. Instead, please use the Finished Product maximum production rates, section (7) of the PI-26 forms, for these operations. The maximum production rates are as follows:

Crib Assembly 10	3,860 lbs/hr
ETC Assembly 11	1,500 lbs/hr
Packing-Cased Goods 16	7,372 lbs/hr
Packing Cribs and Etc. 17	14,363 lbs/hr

Response to Comment 2:

The IDEM agrees. These changes are made in the final Part 70 permit to the description listed in condition A.2, and in the Section D.3 description box. Also changed, for consistency, are (1) and (2). They will read as follows:

(1) Glue Room 5, with a maximum rating of 1,164 pounds per hour **of finished product**. Emissions shall be exhausted at Stack/Vent ID #F1.

(2) Cased Goods Assembly 9, with a maximum rating of 4,350 pounds per hour **of finished product**. Emissions shall be exhausted at Stack/Vent ID #B11, and B12.

(3) Crib Assembly 10, with a maximum rating of 3,8~~52~~**60** pounds per hour **of finished product**. Emissions shall be exhausted at Stack/Vent ID #B94, and B97.

(4) ETC Assembly 11, with a maximum rating of ~~1,486~~ **1,500** pounds per hour **of finished product**. Emissions shall be exhausted at Stack/Vent ID #B73.

(5) Packing Cased Goods 16, with a maximum rating of ~~6,696~~ **7,372** pounds per hour **of finished product**. Emissions shall be exhausted at Stack/Vent ID #B47.

(6) Packing- Cribs & Etc.17, with a maximum rating of ~~13,454~~ **14,363** pounds per hour **of finished product**. Emissions shall be exhausted at Stack/Vent ID #B73.

These changes are not recorded in the Technical Support Document since the OAM prefers that the document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above comment serve as a record of this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under part (c) in Permitted Emission Units and Pollution Control Equipment.

Comment 3:

These sections (*A.2(d), and Descriptions in sections D4, D5, D6, and D7*) contain descriptions of the surface coating operations at Child Craft. The descriptions include the type and quantity of spray application equipment for each booth. The surface coating operations at Child Craft experience a large turnover of colors used. It is common practice to use one spray gun for each color. This practice actually reduces pollution for a surface coating operation that uses many different colors. By having a gun for each color, the source can reduce the use of clean-up solvents and reduce the generation of hazardous waste resulting from clean-up activities.

The type and quantity of spray guns in a given booth is constantly changing as colors are added and deleted. However, the maximum number of operators which can work in a single booth at the same time is a limiting factor. The potential emissions calculated in the permit application were determined using actual operating scenarios performed at their maximum rates. Therefore, the calculated potential emissions include emissions generated by multiple operators in a single booth.

Child Craft is proposing to re-organize the booth description information. The number of operators at a booth is more directly related to the potential emissions than the number of guns that may be present. Therefore, Child Craft proposes to add a column in the description, indicating the maximum number of operators spraying in a booth at one time. Also, since the number and type of spray guns is constantly changing, Child Craft would like to modify the Application Method column to include only the type of guns that may be used, not the quantity. Child Craft is currently collecting this data to assure accuracy. A sheet illustrating the proposed changes and any corrections will follow this correspondence. The information should be organized and forwarded to the IDEM by Thursday, December 3, 1998.

On December 8, 1998, Donan Engineering submitted the following on behalf of Child Craft Industries, Inc. Below, excerpts have been taken from the submittal's cover letter pertaining to the material requested by the source to be changed:

....it was determined that a number of surface coating booths that were not being used were omitted from the Title V application. These booths have been previously permitted and should be included in the Part 70 permit.

Child Craft Industries would also like to clarify the patch area operations, ID numbers P-5, P-6, and P-7. Contradictory to information submitted in the application, these areas do not contain any spraying equipment. P-5, P-6, and P-7 are not booths. They are simply work areas on the production floor where blemishes are touched-up with coatings in aerosol cans. Given this information, please perform any necessary changes.

Response to Comment 3:

As requested, the following have been changed in Sections A.2, parts (d), (e), (f), and (g) and D.4 through D.7, respectively, of the final permit:

(d) ~~Six~~ **Eight** (~~6~~ **8**) spray booths, four (4) dip tanks, one (1) roll coater ~~booth~~**, one (1) skin tank, and three (3) patch areas** as identified in the following table. **Each surface coating station shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ).** Emissions shall be exhausted at Stack/Vent ID # as shown in the following table:

~~Booth~~ **Station** ID	Application Method	**Maximum # of Operators**	Stack/Vent ID #'s
Roll Coat	~~hand,~~ roll coating~~, and dipping~~	**1**	O3, O4
~~Dip Tank/Skin Tank~~	~~dipping~~		~~B94~~
Dip Tank #1	**dipping**	**1**	**B94**
Dip Tank #2	**dipping**	**1**	**B96**
Skin Tank South	**dipping**	**1**	**B80**
B-66	dipping	**1**	B99
B-50	~~1 airless spray gun~~ **spraying**	**1**	B85,B86,B87, B88
P-5	~~5 air supplied spray guns~~ **aerosol spray can**	**n/a**	~~B47~~ **no stack**
P-6	~~3 air supplied spray guns~~ **aerosol spray can**	**n/a**	~~B47~~ **no stack**
P-7	~~1 air supplied spray gun~~ **aerosol spray can**	**n/a**	~~B47~~ **no stack**
B-58	dipping	**1**	B42
~~B-97 *(not in use)*~~	~~1 air supplied spray gun~~		~~B97~~
B-34	**spraying**	**1**	**B3**
B-19	**spraying**	**1**	**B29, B30**
B-23	**spraying**	**1**	**B9, B10**
B-38	**spraying**	**1**	**B13**
B-16	**spraying**	**1**	**B59**
B-20	**spraying**	**1**	**B28**
B-28	**spraying**	**1**	**B21,B22,B23,B24**

(e) Twenty (20) spray booths and one (1) ~~dip~~ **skin** tank~~s~~ as identified in the following table. **Each surface coating station shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ).** Emissions shall be controlled by baffles, then exhausted at Stack/Vent ID # as shown in the following table:

~~Booth~~ **Station** ID	Application Method	**Maximum # of Operators**	Stack/Vent ID #'s
B-9A (Shade**)** ~~*(not in use)*~~	~~2 air supplied, 1 syphon spray guns~~ **spraying**	**1**	~~B113~~ **B35**
B-30 (1) ~~& (2)~~	~~1 airless, 6 HVLP spray guns~~ **spraying**	**1**	B11, B12
B-30 (2)	**spraying**	**1**	**B11, B12**

B-4~~, B-8~~	~~2 HVLP spray guns~~ **spraying**	**1**	~~B63,~~ B66
B-8	**spraying**	**1**	**B63, B64**
Skin Tank**-Main**	dipping	**1**	B64
B-7	~~1 HVLP, 1 airless spray guns~~ **spraying**	**1**	B69, B70, B71
B-9	~~2 airless spray guns~~ **spraying**	**1**	B44, B45, B46
B-13	~~2 HVLP spray guns~~ **spraying**	**1**	B51,B52,B53, B54
B-15	~~1 airless spray gun~~ **spraying**	**1**	B60, B61, B62
~~B34 through B37~~	~~1 airless, 2 HVLP spray guns~~		~~B1,B2,B3,B4,B5~~
B-35	**spraying**	**1**	**B2**
B-26 ~~*(Not in use)*~~	~~1 airless, 5 air supplied, 1 syphon~~ **spraying**	**1**	B16, B17
B-22~~, B24, B17~~	~~5 HVLP, 5 airless spray guns~~ **spraying**	**1**	B6,B7,B8~~,B14,B15,B33,B4~~
B-24	**spraying**	**1**	**B14, B15**
P-1	~~4 air assisted spray guns~~ **spraying**	**1**	~~B112~~ **B97**
P-2	~~8 air assisted spray guns~~ **spraying**	**1**	B93
B-2	~~2 HVLP, 11 air supplied, 1 air mix~~ **spraying**	**1**	B47
B-6	**spraying**	**1**	**B68**
B-56	**spraying**	**1**	**B40**
B-10	**spraying**	**1**	**B43**
B-11	**spraying**	**1**	**B20, B27**

(f) ~~Thirteen~~ **Nineteen** (1~~3~~**9**) spray booths as identified in the following table. **Each booth shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ).** Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID # as shown in the following table.

Booth ID	Application Method	**Maximum # of Operators**	Stack/Vent ID #'s
B-29	~~2 airless, 1 HVLP spray guns~~ **spraying**	**1**	B18, B19
B-12~~*(not in use)*~~	~~2 airless, 1 air supplied spray guns~~ **spraying**	**1**	B48, B49, B50
B-14	~~3 airless spray guns~~ **spraying**	**1**	B55,B56,B57,B58
B-51	~~2 airless, 2 HVLP spray guns~~ **spraying**	**2**	B89**, B90, B91**
B-49	~~3 airless spray guns~~ **spraying**	**2**	B82, B83, B84
B-60	~~5 airless, 2 HVLP spray guns~~ **spraying**	**2**	B100, B101
B-62	~~2 airless, 1 HVLP spray guns~~ **spraying**	**1**	B102
B-61	~~4 airless, 3 HVLP spray guns~~ **spraying**	**2**	B103, B104
B-63	~~1 airless spray gun~~ **spraying**	**1**	B108
P-3	~~5 air assisted spray guns~~ **spraying**	**1**	~~B111~~ **B95**
P-4	~~5 air assisted spray guns~~ **spraying**	**1**	B73
B-69	~~1 HVLP spray gun~~ **spraying**	**1**	B39A
B-70	~~1 HVLP spray gun~~ **spraying**	**1**	**B39**
B-17	**spraying**	**1**	**B33, B34**
B-36	**spraying**	**1**	**B1**
B-37	**spraying**	**1**	**B4, B5**
B-21	**spraying**	**1**	**B26, B25**
B-42	**spraying**	**1**	**B74**
B-47	**spraying**	**1**	**B75**

(g) Eight (8) spray booths as identified in the following table. **Each booth shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ).** Emissions shall be controlled by water wall, then exhausted at Stack/Vent ID # as shown in the following table:

Booth ID	Application Method	**Maximum # of Operators**	Stack/Vent ID #'s
B-45	~~1 airless, 3 HVLP spray guns~~ **spraying**	**1**	B79
B-44	~~1 airless, 1 HVLP spray guns~~ **spraying**	**1**	B78
B-43	~~1 airless, 2 HVLP spray guns~~ **spraying**	**1**	B77
B-64	~~2 electrostatic air assisted spray guns~~ **spraying**	**1**	B106
B-65	~~2 electrostatic air assisted spray guns~~ **spraying**	**1**	B105
B-55	~~2 electrostatic air assisted spray guns~~ **spraying**	**1**	~~B39~~ **B36**
B-53	~~4 electrostatic spray guns~~ **spraying**	**1**	B38

B-54	~~4 electrostatic air assisted spray guns~~ **spraying**	**1**	B37

These changes are not recorded in the Technical Support Document since the OAM prefers that the document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above comment serve as a record of this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under parts (d) through (g) in Permitted Emission Units and Pollution Control Equipment.

Comment 4:

This condition (*D.1.6*) establishes minimum coal sampling and analysis requirements per 326 IAC 3-7-2(b)3. However, the sampling requirements of 326 IAC 3-7-2(b)3 are only applicable for sources with total coal fired capacity between 100 to 1500 MMBtu/hr. Since the total coal fired capacity for this source is 66.8 MMBtu/hr, these requirements do not apply.

326 IAC 7-2-1(c) states that sources with a total coal fired capacity of less than 100 MMBtu/hr shall submit calendar month or annual reports of the average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate **upon request**. Please change condition D.1.6(a)1 to reflect the requirements of the applicable regulation.

Response to Comment 4:

As shown in the Response to Comment 1, the total permitted capacity of the two boilers is 59.3 MMBtu per hour. Because neither 326 IAC 3 nor 326 IAC 7 contain specific compliance procedures for boilers of this size, 326 IAC 2-7-6 requires that this permit establish a method to demonstrate compliance with the applicable emission limit for sulfur dioxide. In the draft permit, the OAM required each source to sample the coal at the premises where it was to be burned, because there are many variables that could account for an error in the vendor analysis. The OAM was particularly concerned with errors that could occur in the transfer of coal from one site to another where shipments of coal with different sulfur contents might become mixed. Another source of error might occur from sampling at mine sites that mine vast amounts of coal per day and take samples from only one area of the mine. However, the OAM believes that it is appropriate to require a less resource intensive procedure than was included in the draft permit. Please refer to 326 IAC 2-7-5(3)(A) and (C) regarding the reporting requirements. Also, the language has been changed in the first sentence, and in parts (a) and (b), of Condition D.1.6, now D.1.7, to read as follows:

> Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing ~~one of~~ the following options:
>
> (a) ~~Coal sampling and analysis shall be performed using one of the following procedures:~~ **Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier as described under 40 CFR 60.48c(f)(3). The certification shall include:**
>
> (1) ~~Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:~~ **The name of the coal supplier; and**
>
> ~~(A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;~~
>
> ~~(B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;~~
>
> ~~(C) Minimum sample size shall be five hundred (500) grams;~~
>
> ~~(D) Samples shall be composited and analyzed at the end of each calendar month;~~

~~(E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or~~

(2) ~~Sample and analyze the coal pursuant to 326 IAC 3-7-2(a);~~ **The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and**

(3) ~~Sample and analyze the coal pursuant to 326 IAC 3-7-3; or~~ **The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and**

(4) The methods used to determine the properties of the coal; and

(b) ~~Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(e)]~~ **Sampling and analyzing the coal using one of the following procedures:**

(1) Minimum Coal Sampling Requirements and Analysis Methods:

(A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;

(B) Coal shall be sampled at least one (1) time per day;

(C) Minimum sample size shall be five hundred (500) grams;

(D) Samples shall be composited and analyzed at the end of each calendar quarter;

(E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or

(2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or

In addition, Condition D.1.8(a), now D.1.9(a), under Record Keeping Requirements, has been changed to read as:

(a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (~~4~~ **5**) below. Records maintained for (1) through (~~4~~ **5**) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO_2 emission limits established in D.1.1 and D.1.2.

(1) Calendar dates covered in the compliance determination period;

(2) Actual coal usage since last compliance determination period;

(3) Sulfur content, heat content, and ash content;

(4) Sulfur dioxide emission rates**; and**

(5) Vendor analysis of coal and coal supplier certification.

Comment 5:

This condition (*D.3.6*) requires weekly inspections of the gluing emissions from the stacks and any presence of overspray on the rooftop and nearby ground. All glue is applied using glue sticks or brushes. Glue is not applied by spraying or any other method which may cause the glue to become transported through the air. The gluing methods utilized do not create overspray of particulate matter type emissions. The only potential emissions from the gluing process are due to the volatilization of VOCs and HAPs in the glue. Please remove this condition since the monitoring method is not appropriate for the type of emissions created by this operation.

Response to Comment 5:

The IDEM agrees. Therefore, Condition D.3.6, Monitoring, has been removed from the final permit. It read as:

~~**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**~~

~~D.3.6 Monitoring~~

~~(a) Weekly inspections shall be performed of the gluing operations emissions from the stacks and any presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Subsequent conditions in this section have been renumbered, and the Table of Contents has been corrected to reflect this change. Also, part (c) in Condition D.3.7 has been deleted, and the previous part (d) is now (c). These two parts now read as:

(c) ~~To document compliance with Condition D.3.6, the Permittee shall maintain a log of weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~ **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

These changes are not recorded in the Technical Support Document since the OAM prefers that the document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above comment serve as a record of this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under the second part (a) in Compliance Requirements for Both Plants.

Comment 6:

These sections [*D.4.6, D.5.7(b), D.6.7(b)*] require weekly inspections "of the presence of any overspray on the rooftops and nearby ground". We request that the word "any" be removed from this phrase, making the language more consistent with the language of condition D.7.7(b). The observation of a large amount of overspray, and more overspray than normally observed, indicates a potential problem with the booth operation and will trigger a response. A slight amount of overspray can be expected when the booth is operating normally. We believe the inclusion of the word "any" in these conditions will trigger responses for normal operations that are in compliance with applicable regulations.

Response to Comment 6:

The IDEM disagrees. In fact, Condition D.7.7(b), now D.7.8(b), Monitoring, should have read as the other monitoring conditions do for the other surface coating sections. The demonstration of continuous compliance with particulate matter limitations are required by the Title V permit. OAM has determined that the presence of overspray or evidence of overspray emissions on the roof may indicate that the process is not in continuous compliance. In addition, the IDEM has made changes regarding monitoring frequency to these conditions. Also revised are the stack ID corrections from Comment 3 of this document. The first sentence of Condition D.4.6, now D.4.7, will read as:

> ~~Weekly~~ **Monthly** inspections shall be performed of the ~~surface coating operations~~ emissions from the **spray coating** stacks (**B3, B9, B10, B13, B21, B22, B23, B24, B28, B29, B30,** ~~B42, B47,~~ **B59,** B85, B86, B87, B88, ~~B94, B97, B99,~~ O3, O4) and any presence of overspray on the rooftops and the nearby ground.

Also, Condition D.4.7, now D.4.8, Record Keeping Requirements, part (c) changes to:

> To document compliance with Condition D.4.~~6~~ **7**, the Permittee shall maintain a log of ~~daily overspray observations, daily and weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Condition D.5.7, now D.5.8, has the following changes to the second sentence of part (a) and the first sentence of part (b):

> (a) .....To monitor the performance of the baffles, ~~daily~~ **weekly** observations shall be made of the overspray from the spray booth stacks (~~B1,~~ B2, ~~B3, B4, B5,~~ B6, B7, B8, B11, B12, B14, B15, B16, B17, **B20, B27,** ~~B33, B34,~~ **B35, B40, B43,** B44, B45, B46, B47, B51, B52, B53, B54, B60, B61, B62, B63, B66, **B68,** B69, **B40,** B70, B71, B93, ~~B112~~ **B97**, ~~B113~~) while one or more of the booths are in operation.....
>
> (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stacks and any presence of overspray on the rooftops and the nearby ground.....

Also, Condition D.5.8, now D.5.9, Record Keeping Requirements, part (c), changes to:

> To document compliance with Condition D.5. ~~7~~ **8**, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Condition D.6.7, now D.6.8, has the following changes to the second sentence of part (a) and the first sentence of part (b):

> (a) .....To monitor the performance of the filters, ~~daily~~ **weekly** observations shall be made of the overspray from the spray booth stacks (**B1, B4, B5,** B18, B19, **B25, B26, B33, B34, B39,** B39A, B48, B49, B50, B55, B56, B57, B58, B73, **B74, B75**, B82, B83, B84, B89, **B90, B91, B95,** B100, B101, B102, B103, B104, B108, ~~B111~~) while one or more of the booths are in operation.....
>
> (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stacks and any presence of overspray on the rooftops and the nearby ground.....

Also, Condition D.6.8, now D.6.9, Record Keeping Requirements, part (c), changes to:

> To document compliance with Condition D.6. ~~7~~ **8**, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Condition D.7.7, now D.7.8, has the following changes to the second sentence of part (a) and the first sentence of part (b):

> (a) .....To monitor the performance of the water walls, ~~daily~~ **weekly** observations shall be made of the overspray from the spray booth stacks (**B1, B4, B5,** B18, B19, **B25, B26, B33, B34, B39,** B39A, B48, B49, B50, B55, B56, B57, B58, B73, **B74, B75**, B82, B83, B84, B89, **B90, B91, B95,** B100, B101, B102, B103, B104, B108, ~~B111~~) while one or more of the booths are in operation.....

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stacks and ~~the~~ **any** presence of overspray on the rooftops and the nearby ground.....

Also, Condition D.7.8, now D.7.9, Record Keeping Requirements, part (c), changes to:

To document compliance with Condition D.7.~~7~~ **8**, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

These changes are not recorded in the Technical Support Document since the OAM prefers that the document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above comment serve as a record of this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under the Compliance Requirement section.

Comment 7:

The compliance schedule allows only 90 days for Child Craft to either control the subject emissions with a baghouse, or perform testing to assure compliance. Child Craft has already initiated steps to rectify this situation, however a solution has not been finalized. With potential solutions requiring engineering design, equipment specification, and coordination of services between multiple contractors, Child Craft would like the schedule to allow for at least 180 days after permit issuance.

Response to Comment 7:

With approval from the air compliance inspector for this source, the IDEM is extending the compliance schedule to 180 days after final permit issuance. The first sentence of Condition D.8.3 now reads as follows:

Pursuant to 326 IAC 2-7-6, the Permittee shall either install a baghouse, to be identified as a new emission unit, reroute the existing duct work from the Child Craft Room and the Sanding Room into an existing baghouse, or conduct a stack test to demonstrate compliance within ~~90~~ **180** days of permit issuance.

Comment 8:

In lieu of weekly parametric monitoring (*D.8.7, D11.6*), Child Craft would prefer to monitor the baghouse operations through quarterly inspections. This monitoring alternative has been included in permits for other furniture manufacturing sources.....

Response to Comment 8:

As a result of the above comment, Conditions D.8.7 and D.11.6, now read as:

D.8.7 (D.11.6) ~~Parametric Monitoring~~ **Baghouse Inspections**

~~The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the Main Plant woodworking process, at least once weekly when the woodworking process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~

~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~ **An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors.**

All defective bags shall be replaced.

Also, the Table of Contents has been changed to reflect the above comment.

Comment 9:

The Wood Furniture NESHAP should not apply to the end coating operation at the East Plant. During this operation, a protective coating is applied to the ends of a stack of lumber to prevent splitting when dried in the kiln. Condition D.10.2 indicates the VHAP limits for finishing operations, contact adhesives, and strippable spray booth materials as established in the Wood Furniture NESHAP. The end coating does not fit into any of the above mentioned categories. This is not a finishing operation and the material is not a stain, washcoat, sealer, topcoat, basecoat or enamel.

Response to Comment 9:

Upon approval of the air compliance inspector for this source, the IDEM agrees. Therefore, the following conditions suggesting any NESHAPs requirements for the lumber end coating operation have been deleted. They read as:

~~D.10.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]~~

~~(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.~~

~~(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:~~

~~(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:~~

~~(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or~~

~~(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or~~

~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or~~

~~(D) Use a combination of (A), (B), and (C).~~

~~(2) Limit VHAP emissions contact adhesives as follows:~~

~~(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight tenths (1.8) pound VHAP per pound solids.~~

~~(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.~~

~~(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.~~

~~(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.~~

~~D.10.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

~~D.10.4 Work Practice Standards [40 CFR 63.803]~~

~~The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:~~

~~(a) Operator training course.~~
~~(b) Leak inspection and maintenance plan.~~
~~(c) Cleaning and washoff solvent accounting system.~~
~~(d) Chemical composition of cleaning and washoff solvents.~~
~~(e) Spray booth cleaning.~~
~~(f) Storage requirements.~~
~~(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).~~
~~(h) Line cleaning.~~
~~(i) Gun cleaning.~~
~~(j) Washoff operations.~~
~~(k) Formulation assessment plan for finishing operations.~~

~~D.10.6 Monitoring~~

~~(a) Weekly inspections shall be performed of the lumber end coating operation emissions from the spray area and any presence of overspray on the nearby ground. The Compliance Response Plan for this operation shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~D.10.7 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.10.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.10.2.~~

~~(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.~~

~~(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.~~

~~(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.~~

~~(4) The VHAP content in weight percent of each thinner used.~~

~~(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.~~

~~(b) To document compliance with Condition D.10.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.~~

~~(c) To document compliance with Condition D.10.6, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

~~D.10.8 Reporting Requirements~~

~~(a) An Initial Compliance Report to document compliance with Condition D.10.2, and the Certification form, shall be submitted within sixty (60) calendar days following the compliance date of November 21, 1997. The Initial compliance report must include data from the entire month that the compliance date falls.~~

~~(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.10.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.~~

~~The six (6) month periods shall cover the following months:~~

~~(1) December 1 through May 31.~~

~~(2) June 1 through November 30.~~

~~(c) The reports required in (a) and (b) of this condition shall be submitted to:~~

~~Indiana Department of Environmental Management~~
~~Compliance Data Section, Office of Air Management~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~and~~

~~United States Environmental Protection Agency, Region V~~
~~Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)~~
~~77 West Jackson Boulevard~~
~~Chicago, Illinois 60604-3590~~

The following description for this operation has been modified to read as follows in Section D.10, and in condition A.2:

Lumber End Coating operation, identified as EC-1, with a maximum rating of 2.16 gallons per hour, using one (1) spray**er** ~~gun~~. Emissions are fugitive.

Also, the condition below now reads as:

D.10.5**2** Testing Requirements [326 IAC 2-7-6(1),(6)] ~~[40 CFR 63, Subpart JJ]~~

~~(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804 (d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.~~

~~(b)~~ **The Permittee is not required to test this facility by this permit. However,** IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Condition~~s~~ D.10.1 ~~and 10.2~~ shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

As a result of the above modifications and deletions, the Table of Contents has also been changed, and the Semi-Annual Reporting Form no longer references the Lumber End Coating operation.

These changes are not recorded in the Technical Support Document since the OAM prefers that the document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above comment serve as a record of this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under the sections for Permitted Emission Units and Pollution Control Equipment, and Federal Rule Applicability- East Plant.

Comment 10:

The first sentence of the second paragraph under the East Plant section refers to “The Lumber End gluing operation”. This operation is lumber end ***coating***, not gluing.

Response to Comment 10:

The IDEM agrees. See the Response to comment 9.

Comment 11:

The calculation at the bottom of page three (3) which shows Dimension room compliance with 326 IAC 6-3-2 is incorrect. The particulate matter contribution from BH-N should be 0.301 lbs/hr, not 0.263 lbs/hr. The operation still complies with 326 IAC 6-3-2.

Response to Comment 11:

The IDEM agrees. The total, using 0.301 lbs/hr, is 1.264 lbs/hr, which is still less than the allowable for this operation.

This change is not recorded in the Technical Support Document since the OAM prefers that the document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above comment serve as a record of this documentation. Therefore, no change as a result of the above comment has been recorded in the TSD Appendix, page 3 of3.

Upon further review, OAM has incorporated the following changes into the final Part 70 permit (changes are **bolded** for emphasis, and previous language changed or deleted has a ~~strikeout line~~ through it).

1. Condition B.27, Credible Evidence, has been deleted. IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana’s statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit. This condition previously read as follows:

   ~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~
   ~~Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.~~

   Also, the Table of Contents has been changed to reflect this deletion.

2. Condition C.3, has been modified to read as follows:

   Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following, unless otherwise stated in this permit:

   (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~ **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.

(b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

3. A new condition, General Provisions Relating to HAPs, has been added to all applicable surface coating Sections, D.3 through D.7. It reads as follows:

General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

In each affected section, this condition is now listed as D.3.3, D.4.3, D.5.3, D.6.3, and D.7.3. Therefore, each subsequent condition has been renumbered, as specified in the Response to Comment 6. The Table of Contents has also been changed to reflect this.

4. The Reporting Requirements Conditions D.3.8, D.4.9, D.5.10, D.6.10, and D.7.10, part (b), have been revised to more accurately portray the reporting schedule for these operations. This part has been changed to read as follows:

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.3.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

~~The six (6) month periods shall cover the following months:~~

(1) ~~December 1 through May 31.~~ **November 21, 1997 through May 20, 1998.**

(2) ~~June 1 through November 30.~~ **May 21, 1998, through November 30, 1998.**

(3) December 1 through December 31, 1998.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

Also, a new part (c) has been added to each condition as follows:

(c) **Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.**

And the previous part (c) language is now part (d). The first sentence of this part will now read as:

(~~c~~ **d**) The reports required in (a)**, (b),** and (~~b~~ **c**) of this condition shall be submitted to:

5. Conditions D.8.8, and D.11.7, Broken Bag or Failure Detection, have been revised. Torn or otherwise failed bags can have a dramatic effect on bag house performance and few sources have reliable information that demonstrates that compliance can be achieved when compartments are "on line" with torn bags. The condition has been revised as follows to clarify that the emergency provisions of the Title V rule and the corresponding condition in this permit may take precedence if applicable. D.8.8 and D.11.7 now read as:

D.8.8 (*D.11.7*) Broken **or Failed** Bag ~~or Failure~~ Detection

In the event that bag failure has been observed.

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

(b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Also, the Table of Contents has been changed to reflect the condition title revision.

6. Condition D.9.2, Carbon Monoxide, has been inaccurately applied to boiler EB-4. It was determined, that the intent of this rule, 326 IAC 9-1, was to apply only to incinerators. This particular unit was installed as a boiler, and exists primarily to heat the dry kilns at this source. Pursuant to the findings of the December 1, 1998 inspection, Child Craft has been using spray booth filters as fuel in their boilers. Therefore, in place of the previous language of this condition, a new requirement has been added. This condition now reads as:

D.9.2 ~~Carbon Monoxide [326 IAC 9-1]~~ **Fuel Usage**

~~Pursuant to Construction Permit # 175-1948-00001 operation condition 9, issued on April 8, 1991, and 326 IAC 9-1 (Carbon Monoxide), the wood-fired boiler's waste gas stream shall be burned in direct-flame afterburners or controlled by other means approved by the commissioner, pursuant to this rule. This boiler's design is hereby approved as an appropriate means of control.~~ **The wood-fired boiler with natural gas as back-up, identified as EB-4, shall use only wood and/or natural gas as fuel.**

Also, for consistency, a similar condition has been added to Section D.1. It reads as:

D.1.3 ~~Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~ **Fuel Usage**

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~ **The wood-fired boilers, identified as B-1 and B-2, with coal for back-up, shall only use wood and/or coal as fuel.**

The previous language of D.1.3, is now D.1.4, as all subsequent conditions in this section have been renumbered. The Table of Contents has also been changed to reflect these condition modifications.

The change regarding the removal of the 326 IAC 9-2 rule applicability is not recorded in the Technical Support Document since the OAM prefers that the document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above modification serve as a record of this documentation. Therefore, no deletion as a result of the above modification has been recorded in the TSD under State Rule Applicability.

Appendix A: Emissions Calculations
Main and East Plant Wood and Coal Fired Boilers

Company Name: **Child Craft Industries**
Address City IN Zip: **501 East Market Street, Salem, Indiana 47167**
1900 Highway 56 East, Salem, Indiana 47167
County: **Washington**
Permit #: **T-175-7877**
Plant ID: **00001**
Reviewer: **Melissa Groch**

WOOD

Heat Input Capacity MMBtu/hr		BTU/lb	Potential Throughput tons/yr
26.5	Boiler B-1	5200	22,321
25	Boiler B-2	5200	21,058
10	Boiler EB-4	5200	8,423

	Pollutant (lbs/ton)							
	PM	PM	PM-10	PM-10	SO2	NOx	VOC	CO
Emission Factor	8.8	Controlled	8.8	Controlled	0.15	1.5	0.22	13.6
(EB-4)	4.4		4.4					
Potential Emission in tons/yr								
Boiler B-1	98.21	16.21	98.21	16.21	1.67	16.74	2.46	151.78
Boiler B-2	92.65	15.29	92.65	15.29	1.58	15.79	2.32	143.19
Boiler EB-4	18.53	n/a	18.53	3.06	0.63	6.32	0.93	57.28
Total (TPY)	190.87	31.49	190.87	31.49	3.25	32.53	4.77	294.98

Main Plant BoilerCyclone Collector Efficiency: 83.50%

COAL

Heat Input Capacity MMBtu/hr		Potential Throughput tons/yr		
33.4	Boiler B-1	13,299	S = Weight % Sulfur =	1
33.4	Boiler B-2	13,299	A = Weight % ash =	7

	Pollutant (lbs/ton)						
	PM	PM	PM-10	SO2	NOx	VOC	CO
Emission Factor	66.0	Controlled	66	38 *(38.0S)*	11.0	0.05	5.0
Potential Emission in tons/yr							
B-1	438.88	72.41	438.88	252.69	73.15	0.33	33.25
B-2	438.88	72.41	438.88	252.69	73.15	0.33	33.25
Total (TPY)	877.75	144.83	877.75	505.37	146.29	0.66	66.50

Cyclone CollectorEfficiency= 83.50%

1 lb bitumous coal has a BTU rating of 13,400
Emission Factors are from AP 42, Tables1.1-1, 1.1-3, 1.1-11 (SCC 1-02-002-04) and 1.6-1, 1.6-2 and 1.6-3 (SCC 1-02-002-04)

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1,0000,000 btu/MMbtu x (BTU/lb wood) / 2,000 lb/to
Emission (tons/yr) = Throughput (tons/ yr) x Emission Factor (lb/ton)/2,000 lb/ton
Controlled Emissions= Uncontrollled Emissions x (1 - Efficiency)

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: **Child Craft Industries**
Address City IN Zip: **501 East Market Street, Salem, IN 47167**
County: **Washington**
Permit #: **T-175-7877**
Plant ID: **00001**
Reviewer: **Melissa Groch**

Industrial Boilers (10 - 100 MMBTU/hr)

Heat Input Capacity

Boiler B-3	20.90	MMBtu/hr	Potential Throughput	183.08	MMCF/yr
Boiler EB-4	13.40	MMBtu/hr	Potential Throughput	117.38	MMCF/yr

		Pollutant					
		PM	PM10	SO2	NOx	VOC	CO
Emission Factor (lb/MMCF)		7.60	7.60	0.60	100.00	5.50	84.00
Potential Emission in tons/yr	B-3	0.70	0.70	0.05	9.15	0.50	7.69
	EB-4	0.45	0.45	0.04	5.87	0.32	4.93

Methodology
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Main Plant and East Plant Woodworking Emissions

Company Name: Child Craft Industries
Addresses: 501 East Market Street, Salem, Indiana 47167
1900 Highway 56 East, Salem, Indiana 47167
County: Washington
Permit #: T-175-7877
Plant ID: 00001
Reviewer: Melissa Groch

Potential Emissions from the Woodworking Process

					Emissions		
Room	Equipment	Control Efficiency	ACFM	Outlet Grain Loading gr/acf	Before Control lb/hr	After Control lb/hr	Allowable lb/hr
Dimension, and Mill	BH-B	99.26%	7160	0.00274	22.70	0.168	* *see below*
Dimension	BH-C	99.26%	37080	0.00250	107.43	0.795	13.37
Dimension	BH-N	99.26%	15520	0.00226	35.54	0.301	13.37
Mill	BH-S	99.26%	37080	0.00202	107.43	0.642	4.21
Child Craft	C1	50.00%	6009	0.04000	4.12	2.060	4.98
Child Craft	C2	50.00%	10,676	0.03000	5.49	2.745	4.98
Sand	C4	50.00%	4595	0.00800	0.63	0.315	9.04
Sand	C5	50.00%	12,409	0.00300	0.64	0.319	9.04
East Plant	EBH-1	95.00%	9,500	0.00790	110.00	0.643	15.10

After Control Emissions: Emissions: (gr/acf)(acf/min)(60 min/hr)(lb/7000 gr)= see above

Before Control Emissions: Emissions: (lbs/hr)/(1-control efficiency) = see above

Allowable Emissions from the Woodworking Process

Throughput:	Dimension Room 4=	11675	Lbs/hr	5.8375	tons/hr
	Mill Room 6=	2081	Lbs/hr	1.0405	tons/hr
	Child Craft Room 7=	2674	Lbs/hr	1.337	tons/hr
	Sand Room 8=	6505	Lbs/hr	3.2525	tons/hr
	East Plant=	14,000	Lbs/hr	7	tons/hr

326 IAC 6-3-2 (Process Operations - Particulate emissions limitations)

$E = 4.10P^{0.67}$ Where E= emissions in lbs/hr
P= process weight rate (throughput) in tons per hour

Dimension Room 4 =	13.37	lbs/hr	58.56	tons/yr
Mill Room 6 =	4.21	lbs/hr	18.44	tons/yr
Child Craft Room 7 =	4.98	lbs/hr	21.82	tons/yr
Sand Room 8 =	9.04	lbs/hr	39.58	tons/yr
East Plant=	15.10	lbs/hr	66.14	tons/yr

Since the potential emission rates from the control equipment in the above table are less than the allowables listed above, then they are in compliance with 326 IAC 6-3-2.

* Since the Dimension room and the Mill room both route into baghouse BH-B, and also into more than one baghouse, then the baghouses that each room routes to are added together only to simplify showing compliance:

Dimension	0.263+0.795+0.168=1.226	1.226 < 13.37 lbs/hr
Mill	0.168 + 0.795 = 0.963	0.963 < 4.21 lbs/hr